# EXHIBIT A

1	WILMER CUTLER PICKERING HALE AND DORR LLP	
2	SONAL N. MEHTA (SBN 222086)	
3	Sonal.Mehta@wilmerhale.com 2600 El Camino Real, Suite 400	
4	Palo Alto, California 94306	
	Telephone: (650) 858-6000	
5	Facsimile: (650) 858-6100	
6	DAVID Z. GRINGER (pro hac vice) David.Gringer@wilmerhale.com	
7	7 World Trade Center	
8	250 Greenwich Street New York, New York 10007	
9	Telephone: (212) 230-8800	
10	Facsimile: (212) 230-8888	
	ARI HOLTZBLATT (pro hac vice) Ari.Holtzblatt@wilmerhale.com	
11	MOLLY M. JENNINGS (pro hac vice)	
12	Molly.Jennings@wilmerhale.com 1875 Pennsylvania Ave NW	
13	Washington, DC 20006	
14	Telephone: (202) 663-6000 Facsimile: (202) 663-6363	
15		
16	Attorneys for Defendant Meta Platforms, Inc.	
17	UNITED STATES DISTRICT COURT	
	NORTHERN DISTRICT OF CALIFORNIA	
18	SAN FRANCISCO DIVISION	
19	MAXIMILIAN KLEIN, et al., on behalf of	Case No. 3:20-cv-08570-JD
20	themselves and all others similarly situated,	
21	Plaintiffs,	DEFENDANT META
22	V.	PLATFORMS, INC.'S THIRD SET OF INTERROGATORIES
23	META PLATFORMS, INC., a Delaware Corporation headquartered in California,	TO ADVERTISER PLAINTIFFS
24	Defendant.	Judge: Hon. James Donato
25		
26		
27		
28		
-	1	

1

2

# **Interrogatory No. 9**

3

4 5

6

7

8 9

10

12

11

13

14 15

16

17

18 19

20

21

22

23

24

25

26 27

28

#### **INTERROGATORIES**

Describe in detail the full basis for Your contention (including by identifying all facts, Documents, and witnesses that relate to Your contention) that a relevant product market is the "Social Advertising Market," as alleged in Paragraphs 766 through 767 of the Advertiser Complaint.

### **RESPONSE:**

**Interrogatory No. 10** 

Describe in detail the full basis for Your contention (including by identifying all facts, Documents, and witnesses that relate to Your contention) that Meta had or has a monopoly in the "Social Advertising Market," including without limitation the date(s) on which you contend the Meta obtained a monopoly in said market, the date on which you contend Meta's monopoly ended in said market, and the reasons that Meta supposedly had a monopoly that began and ended on those dates.

#### **RESPONSE:**

# Interrogatory No. 11

Separately for each act by Meta that You contend to be exclusionary, describe in detail the full basis for Your contention (including by identifying all facts, Documents, and witnesses that relate to Your contention) including without limitation all actual or potential competitors excluded from any candidate relevant market.

#### **RESPONSE:**

# **Interrogatory No. 12**

If You contend that barriers to entry in the Social Advertising Market are insurmountable, describe in detail the full basis for Your contention (including by identifying all facts, Documents, and witnesses that relate to Your contention) including without limitation how